

Thank you for consideration of the ARRL license restructure proposal. I have been licensed in the ARS for almost 40 years and have seen a variety of restructures over the years. There are many things in the ARRL license restructure proposal that I fully agree with. The creation of a new and viable entry level license and the merging of the Advanced and Extra class licenses are the most notable suggestions for improvement of the Amateur Radio Service.

The possibility of keeping a code testing requirement for the Extra (and hopefully the General) serves to recognize that there are still reasons within the ARS to maintain some level of code proficiency within the ranks of the higher classes of license. The possibility of eliminating the present "orphaned" licensed classes (Advanced, Novice, and Tech+ - Tech with code) is something which should have been done with the last restructure in 2000.

If the ARRL proposal is adopted, it will have the effect of narrowing down the license structure to three tested for classes, Beginner, General and Extra. The Beginner class license with it's good spate of HF and VHF operating privileges is long past due. Presently, the Novice, with it's HF and very limited VHF / UHF privileges is not tested for. The present no code Technician class is in fact the entry level license and is often times a dead end for it's holders. This would also be the license class which would not require a code test to obtain some HF privileges.

However, this proposal has two serious flaws that need to be addressed.

1. As proposed, the Beginner class would be made up of existing Novice license holders while the Technician Class would receive a grandfather promotion into the existing General class. Since the Technician class is the existing entry class, there should be some thought given to initially putting all Technician variants and the present Novice class into the proposed Beginner class instead of the automatic upgrade to General for the Technician.

There has been some concern that the Technician would actually lose some privileges above 50 MHz if this were to happen. On the other hand existing Novices would lose some privileges on 10 meters under the ARRL proposal.

I would propose that the FCC consider granting all existing Technician class privileges as well as those additional HF privileges as proposed by the ARRL for the Beginner class. This would mean that existing Technicians and Novices populate the proposed Beginner class and everyone gains something. Under the ARRL proposal, upgrade to General from this class would be via a 25 - 35 question exam and no code testing.

However, I also feel that the General class license should retain the very minimal code test of 5WPM. The FCC has historically recognized that the 5WPM test is of such a level that medical waivers were never issued to those taking the test.

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